

## **EXHIBIT 5**

Kristen Streater, PH.D.

February 15, 2023

THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

JOSEPH MICHAEL PHILLIPS, )  
 )  
Plaintiff, )  
 )  
VS ) CIVIL ACTION NO.  
 ) 4:22-cv-184-ALM  
COLLIN COUNTY COMMUNITY )  
COLLEGE DISTRICT, et al., )  
 )  
Defendants. )

\*\*\*\*\*  
VIDEOTAPED DEPOSITION OF  
KRISTEN STREATER, PH.D.  
FEBRUARY 15, 2023  
\*\*\*\*\*

VIDEOTAPED DEPOSITION OF KRISTEN STREATER,  
PH.D. produced as a witness at the instance of  
the Plaintiff, and duly sworn, was taken in the  
above-styled and numbered cause on the 15th of  
February, 2023, from 2:57 to 6:47, before Susan  
S. Klinger, RMR-CRR, CSR in and for the State  
of Texas, reported by stenographic method, at  
Abernathy Roeder Boyd & Hullett, PC, 1700 N.  
Redbud Boulevard, Suite 300, McKinney, Texas  
pursuant to the Federal Rules of Civil  
Procedure and the provisions stated on the  
record or attached hereto.  
Job No. 916122

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P R O C E E D I N G S

VIDEOGRAPHER: Good afternoon, we are now on record. This begins videotape number 1 in the deposition of Kristen Streater in the matter of Joseph Michael Phillips versus Collin County Community College District, et al.

Today's date is February 15th, 2023 and the time is 2:57.

Will the court reporter please swear in the witness.

KRISTEN STREATER, PH.D.,  
having been first duly sworn testified as follows:

EXAMINATION

BY MR. BLEISCH:

Q. Good afternoon.

A. Hi.

Q. My name is Josh Bleisch. I will be taking your deposition today. Before we get started on the questions about this case, I have a few introductory points and questions I would like to ask you.

A. Okay.

Q. Would you please state your name and

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1 address for the record?

2 A. Dr. Kristen Streater. My address is  
3 405 Creekside Drive in Richardson, Texas 75081.

4 Q. Thank you. Have you ever been  
5 deposed before?

6 A. No.

7 Q. Okay. So I will tell you a little  
8 bit about how this is going to work. I'm going  
9 to be asking you questions and you will be  
10 answering them. When you do answer, please  
11 remember to answer all of my questions  
12 verbally. Head nods, head shakes, even uh-huhs  
13 or huh-huhs, don't reflect well in the written  
14 record so please make sure to do that.

15 A. Okay.

16 Q. Also please remember to wait until  
17 I'm done asking a question before you begin  
18 your answer. I will also try to extend you  
19 that same courtesy waiting for you to finish  
20 your answer before I begin a new question.

21 A. Okay.

22 Q. Do you understand that you are under  
23 oath?

24 A. I do.

25 Q. If I ask any question that you don't

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1 a college directive from the president of the  
2 college.

3 Q. Was Dr. Matkin's directive policy?

4 MR. CRAWFORD: Objection, form.

5 A. No.

6 Q. Are employees expected to comply  
7 with directives like that?

8 A. Yes.

9 Q. And how did Dr. Phillips violate  
10 that directive?

11 A. The directive, as I remember it as  
12 is quoted in the coaching form stated, please  
13 refer all press inquiries you may receive to  
14 Marisela Cadena-Smith at that email address or  
15 by phone to the president's office.

16 And Dr. Phillips was approached and  
17 talked to, was interviewed by the Washington  
18 Post and that doesn't follow that directive to  
19 refer a press inquiry to either PR or the  
20 president's office.

21 Q. Does that directive involve any  
22 media inquiry or inquiries about the El Paso  
23 shooting only?

24 A. My understanding is that the  
25 directive was about the El Paso shooting only.

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1 Q. How was that any different from the  
2 interview that Dr. Phillips gave to the  
3 Washington Post where he was also -- he also  
4 asked not to be identified as a professor at  
5 Collin College?

6 MR. CRAWFORD: Objection, form.

7 A. The difference is that there had  
8 been a directive given in the Washington Post  
9 situation that any press inquiries were to go  
10 to the PR department or to the president's  
11 office, and that is not the situation here.

12 Q. Well, you testified that the  
13 directive was about press inquiries relating to  
14 the El Paso shooting?

15 A. That's correct.

16 Q. Didn't Dr. Phillips give an  
17 interview to discuss his expertise in race  
18 relations in the Dallas area?

19 A. For the Washington Post?

20 Q. Yes.

21 A. That is what he stated.

22 Q. Not about the El Paso shooting?

23 A. My understanding of the directive  
24 was that any press inquiries at that time were  
25 to be referred to PR or to the president's

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1 office.

2 Q. Regardless of topic?

3 A. The topic at the time was the El  
4 Paso shooting. So if he -- anybody had been  
5 reached out to by the press, they were to refer  
6 that inquiry to the PR or the president's  
7 office.

8 Q. Was that directive ever rescinded?

9 A. I don't know.

10 Q. Is it still in effect?

11 A. No, but I don't know that there has  
12 been a formal rescinding of that.

13 Q. Can we look at page 147 now. What  
14 are these images that you sent to  
15 Dr. Barnes-Tilley?

16 A. They are screenshots of  
17 Dr. Phillips' -- they appear to be Facebook  
18 postings.

19 Q. Were you in the habit of taking  
20 screenshots of Michael's social media posts at  
21 this time?

22 A. What do you mean by "habit"?

23 Q. Did you do this often?

24 A. At the time I was taking screenshots  
25 of Dr. Phillips.



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COLLEGE DISTRICT, et al., )  
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REPORTER'S CERTIFICATION

DEPOSITION OF KRISTEN STREATER, PH.D.

February 15, 2023

I, Susan S. Klinger, Certified Shorthand  
Reporter in and for the State of Texas, hereby  
certify to the following:

That the witness, KRISTEN STREATER, PH.D.,  
was duly sworn by the officer and that the  
transcript of the oral deposition is a true  
record of the testimony given by the witness;

That the deposition transcript was  
submitted on \_\_\_\_\_, 2023 to the  
witness or to the attorney for the witness for  
examination, signature and return to me by



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1 \_\_\_\_\_, 2023;

2 That the amount of time used by each party  
3 at the deposition is as follows:

4 Mr. Bleisch: 3:12

5 That pursuant to information given to the  
6 deposition officer at the time said testimony  
7 was taken, the following includes counsel for  
8 all parties of record:

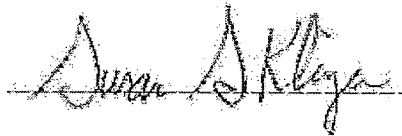
9 Mr. Bleisch, Attorney for Plaintiff(s)

10 Mr. Crawford, Attorney for Defendant(s)

11 Mr. J. Bailey McShane, IV, Attorney for  
12 Defendants

13 I further certify that I am neither  
14 counsel for, related to, nor employed by any of  
15 the parties or attorneys in the action in which  
16 this proceeding was taken, and further that I  
17 am not financially or otherwise interested in  
18 the outcome of the action.

19 Certified to by me this 26th day of  
20 February, 2023.

21   
22

23 Susan S. Klinger,  
24 Texas CSR No. 6531  
25 Expiration Date: 10/31/23